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September 11, 2002

2005 Standards  
c/o Bryan Alcorn  
California Energy Commission  
1516 Ninth Street, MS-25  
Sacramento, CA 95814-5504

Dear Mr. Alcorn:

On behalf of the School Facility Manufacturers' Association (SFMA), representing manufacturers supplying over two-thirds of the modular classrooms in California, I would like to express my concern with some elements of the Code Change Proposal for High Performance Relocatable Classrooms (June 28, 2002).

SFMA members are concerned about energy efficiencies but we compete in a large market for educational facilities dollars and do not want to be disadvantaged. In your proposal "RC's are proposed to be treated as a special category of buildings with its own standard requirements." We view our product as being no different from site or "stick-built" construction other than the obvious fact that we utilize modular construction. As an industry, we have come a long way from our industry being perceived as "trailer" manufacturing. To establish a special standard for our industry would be a step in the wrong direction.

In the overview section of your proposal you advocate that additional measures beyond the scope of the current Title 24 should be imposed upon relocatable classrooms. You also suggest that our industry would be held to a higher standard than the 2005 Title 24, which is of course a work in progress, when it is adopted. If the code adoption progress decides that all or a portion of your energy efficiency recommendations are cost-effective and should be adopted, we, as an industry, will obviously comply but do not feel that we should be held to a higher standard than other non-residential buildings in California.

You additionally recommend that our industry comply with the most stringent climate zone or orientation. This surely should be a decision that each manufacturer should make when reviewing the costs associated with, and the advantages of, standardization. Again, we should not be held at a competitive disadvantage just because of our manufacturing process.

*Innovative design benefiting California school children every day.*

Modular buildings approved by the Division of the State Architect to meet earthquake and safety standards of the Field Act.



September 11, 2002

Your report further calls for “A set of prescriptive envelope component measures that would apply to all relocatable classrooms built, sold, and leased in California.” Part of your objective here seems to be simplifying enforcement (always a laudable objective), but once again we would be placed at a competitive disadvantage. Additionally, our leasing company customers might see the value of their fleets diminish if new standards are adopted that cannot be reasonably retrofitted. We certainly wish to maintain the same flexibility of adopting a performance approach in engineering our products which “stick-built” competitors can and do utilize.

Finally, you propose eliminating the 10% glazing area trade-off in the prescriptive Overall Envelope Approach. Once again, our industry would be treated differently than our competition. Increased window areas and natural day lighting are obviously potential sources of additional energy usage, so their implementation should be carefully studied with the various competing trade-offs considered.

SFMA and its members are proactive in energy efficiency areas. We are very receptive to your proposals but feel that our industry should not be singled out. We certainly respect the time and effort Daryl Mills has expended in keeping us informed and would welcome a meeting where we can understand each others’ objectives and begin working towards a common goal of making all California classrooms more energy efficient.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Mike Henning', is positioned above the typed name.

Mike Henning  
*Chair, SFMA*

MH:pfh